

Craig Friedberg, Esq.
Nevada Bar No. 004606
LAW OFFICES OF CRAIG B. FRIEDBERG, ESQ.
4760 South Pecos Road, Suite 103
Las Vegas, Nevada 89121
Ph: (702) 435-7968
attcbf@cox.net

Attorneys for Plaintiff Oren Franks and the Putative Class

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

OREN FRANKS, individually and on behalf
all others similarly situated,

Plaintiff,

v.

LENS.COM, INC.,

Defendant.

Case Number: 2:24-cv-00724-JAD-NJK

**STIPULATION AND ORDER TO EXTEND TIME
TO FILE OPPOSITION TO
DEFENDANT'S MOTION TO
DISMISS CLASS ACTION
COMPLAINT AND TO FILE REPLY
BRIEF
[First Request]**

It is hereby stipulated and agreed by and between the undersigned parties, Plaintiff Oren Franks ("Plaintiff") and Defendant Lens.com, Inc. ("Defendant"), that the time to file Plaintiff's opposition to Defendants' Motion to Dismiss Class Action Complaint filed on June 14, 2024 (ECF No. 13) and currently due on June 28, 2024, is extended to July 12, 2024 and Defendant's time to file a reply brief is extended to July 26, 2024. Further, the parties state as follows:

1. The Class Action Complaint was filed on April 12, 2024 (ECF No. 1);
2. Defendant filed its Motion to Dismiss Class Action Complaint on June 14, 2024 (ECF No. 13);
3. Plaintiff's counsel is diligently working on preparing Plaintiff's response to the motion;
4. In the interest of justice and to ensure that the Court receives a well-prepared response, Plaintiff requests an extension of time to file the opposition to July 12, 2024;
5. Defendant, through its counsel, consents to the extension;
6. Defendant also requests an extension to file its reply brief until July 26, 2024;

7. This is the first request for an extension of time to file opposition to Defendant's motion to dismiss or the reply brief.

Dated: June 25, 2024

By: /s/ Matthew R. Mendelsohn
Matthew R. Mendelsohn
(Admitted *Pro Hac Vice*)
MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway
Roseland, New Jersey 07068
Tel: (973) 228-9898
mrm@mazieslater.com

Craig B. Friedberg, Esq.
Nevada Bar No. 004606
LAW OFFICES OF
CRAIG B. FRIEDBERG, ESQ.
4760 South Pecos Road, Suite 103
Las Vegas, Nevada 89121
Tel: (702) 435-7968
attcbf@cox.net

Todd S. Garber
(Admitted *Pro Hac Vice*)
FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP
One North Broadway, Suite 900
White Plains, New York 10601
Tel: (914) 298-3281
tgarber@fbfglaw.com

Attorneys for Plaintiff

By: /s/ Richard J. Pocker
Richard J. Pocker (SBN 3568)
BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
Las Vegas, NV 89101
Telephone: (702) 382-7300
Email: rpocker@bsfllp.com

Mark M. Bettilyon (Pro Hac Vice to be filed)
Jed H. Hansen (Pro Hac Vice to be filed)
THORPE NORTH & WESTERN LLP
175 South Main, Suite 900
Salt Lake City, Utah 84111
Telephone: (801) 566-6633
Email: mark.bettilyon@tnw.com
Email: hansen@tnw.com

Attorneys for Defendant Lens.com, Inc.

Based on the parties' stipulation and with good cause appearing, IT IS ORDERED that Plaintiff's deadline to respond to the motion to dismiss [ECF No. 13] is extended to July 12, 2024, and Defendant's deadline to file a reply brief is extended to July 26, 2024.


6/25/24
UNITED STATES DISTRICT JUDGE